IN THE UNITED STATES BANKRUPTCY COURT FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

IN RE: : CHAPTER 13

JEREMY LEE BRININGER

Debtor : CASE NO. 1:22-bk-00636

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LAKEVIEW LOAN SERVICING, LLC, Movant

iovant

v. :

JEREMY LEE BRININGER, Respondent

MOTION FOR RECONSIDERATION OF ORDER GRANTING RELIEF FROM STAY

COMES NOW the Debtor, Jeremy Lee Brininger, by and through Dorothy L. Mott, Esquire, and requests reconsideration of the order granting relief from stay, respectfully stating in support thereof:

- 1. The Debtor filed a Chapter 13 Petition on April 7, 2022
- 2. The Debtor fell behind in the monthly payments to the mortgagee, Lakeview Loan Servicing and entered into a stipulation to cure arrearages and continue to make regular monthly mortgage payments.
- 3. Lakeview filed a Certificate of Default on December 4, 2023 and the order granting relief was entered on December 5, 2023.
- 4. The Debtor has the funds to cure the default...

WHEREFORE, the Debtor respectfully requests that this Court enter an order rescinding the Order granting relief from stay and reinstate the automatic stay in Debtor's case.

Respectfully submitted,	
/s/ Dorothy L. Mott	
Dorothy L. Mott, Esquire	_

doriemott@aol.com MOTT & GENDRON LAW 125 State Street Harrisburg, PA 17101 http://www.mottgendronlaw.com T: (717) 232-6650 | F: (717) 232-0477

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ORDER

UPON CONSIDERATION of the Motion For Reconsideration Of Order Granting Relief from the Automatic Stay, it is hereby

ORDERED AND DECREED that the Order Granting Relief from the Automatic Stay entered on December 5, 2023 is hereby vacated; and the automatic stay is reinstated.

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CERTIFICATE OF SERVICE

I, the undersigned, hereby certify that on <u>December 19, 2023</u>, I served a copy of the served a copy of the foregoing document(s) electronically or by placing the same in the United States Mail, First Class, postage pre-paid, addressed as follows on the following parties:

Name and Address	Mode of Service
JACK N. ZAHAROPOULOS	Electronically
STANDING CHAPTER 13 TRUSTEE	
8125 ADAMS DRIVE, STE A	
HUMMELSTOWN, PA 17036	
Denise E. Carlon on behalf of Creditor LAKEVIEW	Electronically
LOAN SERVICING, LLC	
bkgroup@kmllawgroup.com,	
bkgroup@kmllawgroup.com	
Michael Patrick Farrington on behalf of Creditor	
LAKEVIEW LOAN SERVICING, LLC	
mfarrington@kmllawgroup.com	
Brian Nicholas on behalf of Creditor LAKEVIEW	
LOAN SERVICING, LLC	
bnicholas@kmllawgroup.com	

I certify under penalty of perjury that the foregoing is true and correct.

Date: 12/19/2023

/s/ Dorothy L. Mott

Dorothy L. Mott doriemott@aol.com MOTT & GENDRON LAW 125 State Street Harrisburg, PA 17101 http://www.mottgendronlaw.com T: (717) 232-6650 | F: (717) 232-0477